

EXHIBIT "E"

**DECLARATION OF SUSAN BARILICH, COUNSEL FOR
CREDITOR LIPP CDS INC.**

I, Susan Barilich, declare as follows:

1. My declaration is based upon personal knowledge, except where otherwise stated, and if called upon to testify to the matters set forth herein, I could and would competently do so.

2. I am a member in good standing of the highest Court of the States of California and Texas. I am not eligible to become a member of the permanent bar of this Court.

3. I am an active member in good standing of the U.S. Bankruptcy Court for the Central District of California, I am an active member in good standing of the U.S. Bankruptcy Court for the Northern District of Texas, and I am an active member in good standing of the U.S. Bankruptcy Court for the Southern District of Ohio.

4. I have not been admitted to the bar of this Court; however, this Motion falls within the description of claims litigation as set out in Local Rule 9010—1(e)(3), which indicates that *pro hac* admission is not required to prosecute a proof of claim or a response to the claim. In the event that the Court requires that I be admitted *pro hac* vice in this Court, then I will comply with that requirement within the time limits permitted by Local Rule 9010—1(d).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 23 day of May, 2025, at Glendale, California.

